

1 Gary S. Lincenberg - State Bar No. 123058
glinenberg@birdmarella.com
2 BIRD, MARELLA, BOXER, WOLPERT, NESSIM,
DROOKS, LINCENBERG & RHOW, P.C.
3 1875 Century Park East, 23rd Floor
Los Angeles, California 90067-2561
4 Telephone: (310) 201-2100
Facsimile: (310) 201-2110

5 Attorneys for Defendant Stephen Keith
6 Chamberlain

7
8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 MICHAEL RICHARD LYNCH AND
STEPHEN KEITH CHAMBERLAIN

15 Defendants.
16
17
18
19
20
21
22
23
24
25
26
27
28

CASE NO. 3:18-cr-00577-CRB

UNOPPOSED *EX PARTE*
APPLICATION TO CONTINUE
STATUS CONFERENCE TO JULY
17, 2019

Filed Concurrently with [Proposed]
Order

Assigned to Hon. Charles R. Breyer

1 Defendant Stephen Chamberlain, by and through his counsel of record,
2 hereby files this unopposed *ex parte* application to continue the status conference in
3 this matter from July 10, 2019, to July 17, 2019 at 10 a.m. Counsel for Mr.
4 Chamberlain has a scheduling conflict and is required to be in court on another
5 matter in another city on July 10. Counsel for the government and counsel for Mr.
6 Lynch have both indicated that they have no objection to the requested continuance.
7 In light of the anticipated continuance and due to the difficulty of rearranging
8 international travel to the United States for Mr. Chamberlain due to his status, and
9 because of his own travel plans the week of July 17, counsel has also informed the
10 other parties that we will be filing a waiver of appearance for Mr. Chamberlain for
11 the status conference. Neither the government nor counsel for Mr. Lynch expressed
12 any objection.

13
14 DATED: June 26, 2019

Gary S. Lincenberg
Bird, Marella, Boxer, Wolpert, Nessim,
Drooks, Lincenberg & Rhow, P.C.

15
16
17
18 By: /s/ Gary S. Lincenberg
19 Gary S. Lincenberg
20 Attorneys for Defendant Stephen
21 Chamberlain
22
23
24
25
26
27
28